

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Dr. Sebastian Okechukwu Mezu, Chairman
EMEKUKU COMMUNITY BANK NIGERIA LIMITED,
4011 Old Court Road
Pikesville, Maryland 21208

Plaintiff,

v.

: Civil No.

JKB 12 CV 2865

Progress Bank of Nigeria PLC
c/o Alhaji Umaru Ibrahim, mni.
Managing Director & Chief Executive
Nigeria Deposit Insurance Corporation (NDIC)
Plot 447/448 Constitution Avenue
Central Business District
P.M.B. 284, Garki
Abuja, Nigeria

Nigeria Deposit Insurance Corporation (NDIC)
c/o Alhaji Umaru Ibrahim, mni.
Managing Director & Chief Executive
Plot 447/448 Constitution Avenue
Central Business District
P.M.B. 284, Garki
Abuja, Nigeria

Defendants.

APPLICATION TO RECORD A FOREIGN JUDGMENT

COMES NOW Plaintiff, Dr. Sebastian Okechukwu Mezu, Chairman, Emekuku Community Bank Nigeria Limited, through its attorneys C. Valerie Ibe, Esq., pursuant to 28 U.S.C. § 1963 (1988) hereby files this application to record a Foreign Judgment and registers an exemplified copy of the Judgment, attached hereto as "Exhibit 1" as follows:

Emekuku Community Bank Nigeria Limited v (1) PBN Finance and Trust Company Limited, (2) Progress Bank of Nigeria PLC, delivered by the (FEDERAL HIGH COURT [NIGERIA] HOLDEN AT PORT-HARCOURT, SUIT No.: FHC/PH/121/96 , on October 21, 1999 signed by L. O. EGBUCHE, Senior Registrar of the Federal High Court Port Harcourt and signed and sealed by P. F. Olayiwola, Presiding Judge on August 1, 2001 and filed with this Court on September 24, 2012.

DATED this 24 day of September, 2012.

Respectfully Submitted:



C. Valerie Ibe, Esq.
Law Offices of C. Valerie Ibe
A Professional Law Corporation
1008 Reisterstown Road,
Pikesville, Maryland 21208
Bar No: 29755
Telephone: 410-484-1247
Email: Valerie@cvalerieibe-law.com, kancvi@aol.com, bapress@aol.com

Attorneys for the Plaintiff

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Abuja, Nigeria

Defendants. :

FURTHER AFFIDAVIT OF JUDGMENT CREDITOR

I, Sebastian Okechukwu Mezu, Chairman, Emekuku Community Bank Nigeria Limited, being first duly sworn upon oath depose and say as follows:

1. The name and last known post office address of the judgment debtor is:

Progress Bank of Nigeria PLC
c/o Nigeria Deposit Insurance Corporation (NDIC)
c/o Alhaji Umaru Ibrahim, mni.
Managing Director & Chief Executive

**Plot 447/448 Constitution Avenue
Central Business District
P.M.B. 284, Garki
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**Plot 447/448 Constitution Avenue
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Abuja, Nigeria**

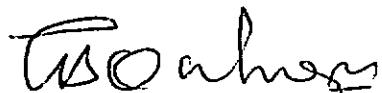
2. The name and last known address of the judgment creditor is:

EMEKUKU COMMUNITY BANK NIGERIA LIMITED,
c/o Dr. Sebastian Okechukwu Mezu, Chairman
4011 Old Court Road
Pikesville, Maryland 21208

3. The foreign judgment that is attached to the Application of Foreign Judgment is valid and enforceable.

4. As of September 15, 2012, \$0.00 (ZERO dollars) of the foreign judgment has been satisfied and \$720,088.67 (Seven Hundred and Twenty Thousand Eighty-Eight Dollars and Sixty-Seven Cents) remains due and owing.

FURTHER YOUR AFFIANT SAYETH NOT:



Sebastian Okechukwu Mezu, Chairman
Emekuku Community Bank Nigeria Limited

I declare under penalty of perjury under the law of the State of Maryland that the foregoing is true and correct.

Signed this 21st day of September, 2012



Sebastian Okechukwu Mezu

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Dr. Sebastian Okechukwu Mezu, Chairman
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Plot 447/448 Constitution Avenue
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Abuja, Nigeria

Defendants.

VERIFICATION

I, Dr. Sebastian Okechukwu Mezu, Chairman, Emekuku Community Bank Nigeria Limited, under penalties of perjury, being first duly sworn, deposes and says:

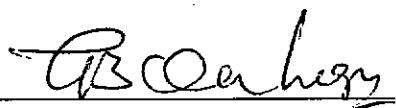
1. That I am the Chairman of the Board of Directors of Emekuku Community Bank Nigeria Limited, duly authorized to act on behalf of the Plaintiff company in the above-entitled action;
2. That I have read the foregoing Application of Foreign Judgment and know the contents thereof;

3. That the same is true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true.

4. I declare under penalty of perjury under the law of the State of Maryland that the foregoing is true and correct.

DATED this 21st day of September, 2012.

By:



Dr. Sebastian Okechukwu Mezu,
Chairman, Emekuku Community Bank Nigeria Limited

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Dr. Sebastian Okechukwu Mezu, Chairman
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U.S. DISTRICT COURT
DISTRICT OF MARYLAND
CITY

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Abuja, Nigeria

Defendants.

**NOTICE OF FILING OF APPLICATION OF FOREIGN JUDGMENT
AND AFFIDAVIT OF JUDGMENT CREDITOR**

TO: Nigeria Deposit Insurance Corporation (NDIC)
c/o Alhaji Umaru Ibrahim, mni.
Managing Director & Chief Executive
Plot 447/448 Constitution Avenue
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TO: Progress Bank of Nigeria PLC
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Nigeria Deposit Insurance Corporation (NDIC)
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Abuja, Nigeria

Defendant

PLEASE TAKE NOTICE that an Application of Foreign Judgment, a copy of which is attached as "Exhibit 1", and an Affidavit of Judgment Creditor, a copy of which is attached as "Exhibit 2", were filed in the above-referenced case on the 24 day of September, 2012.

DATED this 21st day of (month) September, (year) 2012.

Respectfully Submitted:

C. Valerie Ibe
C. Valerie Ibe, Esq.
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A Professional Law Corporation
1008 Reisterstown Road,
Pikesville, Maryland 21208
Telephone: 410-484-1247
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Attorney for the Plaintiff